

FY26 DCR DWSP Forestry Proposal:

Summary of Public Comments and DWSP Responses

June 25, 2026

Overview

The Department of Conservation and Recreation (DCR), Division of Water Supply Protection (DWSP) posted its Fiscal Year 2026 (FY26) proposed forest management projects for public comment on September 1, 2025 for a 45-day review period, which concluded on October 16, 2025. The public comment period was initiated to gather input on any or all of the proposed FY26 forest management projects.

The Division solicited public comments on 23 proposed forest management projects and carefully reviewed all the comments received. In total, 77 comments were received either through DCR's online portal or through direct emails to DWSP staff. The majority (75) of comments did not address specific projects. Rather, they expressed broad perspectives on DWSP's overall forestry policies and practices including forest stewardship, watershed protection, biodiversity, and climate impacts. Many of these comments shared common themes related to soil and water protection, the role of active versus passive management, wildlife habitat, carbon storage, resilience to climate change, transparency, and the scientific basis for decision-making.

The remaining two comments addressed specific project proposals. These project-specific comments are summarized in the last section, each followed by DCR's response.

To address these more general comments, DWSP offers the following regarding its goals, guiding framework, and the processes that inform watershed forest stewardship.

General Statement

DWSP manages forested watershed lands with a primary goal of protecting drinking water quality by stewarding healthy, diverse, and resilient forest ecosystems that also provide wide-ranging public benefits. DWSP's watershed forests contribute to clean air and water, wildlife habitat, recreation opportunities, climate resilience, and long-term carbon storage in Massachusetts. Consistent with the Department of Conservation and Recreation's broader land management mission and the Commonwealth's climate objectives, DWSP's management approach integrates the best available science, professional land management expertise, and data from decades of continuous monitoring to ensure that forest stewardship actions sustain these benefits for current and future generations.

DWSP's forestry practices, including those employed in the 23 proposed projects, are grounded in applied science, on-the-ground experience, and long-term data collection. Continuous forest inventory plots, watershed monitoring, regeneration surveys, wildlife assessments, and water-quality sampling collectively inform an adaptive management model in which practices are routinely evaluated and refined as new ecological research, climate science, and field data become available. This approach supports both carbon sequestration and forest resilience by maintaining diverse species composition, structural complexity, and a range of age classes across the landscape.

The principles, goals, and practices that guide the Division's work are described in detail in the [DWSP 2017 Land Management Plan \(LMP\)](#), which remains a foundational framework for watershed forest

stewardship. The LMP is implemented using adaptive approaches that are continually evaluated and refined as new ecological research, climate science, and field data becomes available. In concert with the LMP, DWSP foresters are guided by practices that were updated and/or newly instituted to implement the results of the recent Forests as Climate Solutions initiative launched by the Healey-Driscoll Administration.

In June, 2023, the Commonwealth launched Forests as Climate Solutions that included a review of forest management on state lands stewarded by DCR's Division of Water Supply Protection, DCR's Division of State Parks and Recreation, and the Department of Fish and Game's Division of Fisheries and Wildlife. A primary goal of the review was to ensure that state forestry activities were informed by the latest climate science and reflect the importance of carbon sequestration and storage, in concert with other agency goals. A Climate Forestry Committee was assembled consisting of 12 esteemed members with diverse backgrounds and expertise in different aspects of climate science and forest land management to review current practices and to make recommendations for future actions.

In January 2024, the Climate Forestry Committee issued a [Report of the Climate Forestry Committee Recommendation for Climate-Oriented Forest Management Guidelines. \(CFC Report\)](#) with recommendations regarding forest management on state stewarded lands. In response, the Executive Office of Energy and Environmental Affairs (EEA) released a comprehensive work plan, [Response to the Report of the Climate Forestry Committee](#) (Response), in June 2024 outlining how the three divisions (including DWSP) would pursue climate-informed forest land conservation and management. The approach the Administration is pursuing, embraced by DWSP, emphasizes a balanced combination of both active and passive management techniques, prioritizes long-term carbon stability, enhances biodiversity, and strengthens forest resilience to pests, disease, and climate driven disturbances.

With respect to water supply protection, the Response stated the following:

The CFC did not reach consensus as to whether active forestry is necessary on watershed lands to support water quality. Credible science was cited both supporting and opposing active management.

Given this circumstance, and that to date active management has contributed to maintaining a healthy forest filter that protects the water supply, the Division of Water Supply Protection will continue to utilize a broad range of forest management strategies across a spectrum from passive to active, with an emphasis on passive, to manage watered forests.

In so doing, it will assess where passive management can best achieve management objectives and otherwise ensure that the climate guidelines recommended by the CFC are reflected in the decision-making process and forestry operations.

The Response also indicated that the Commonwealth would perform forest management with a changing climate in mind. As DWSP Foresters developed the project proposals, and selected certain management approaches, they evaluated climate-informed strategies and applied climate considerations to the proposals. A description of the climate considerations is contained in each proposal.

As to transparency and public engagement, both are central to DWSP's work and have been enhanced. The Response stated:

Management objectives will be clearly articulated both at the program and project level and the forestry proposal process will be explicit, transparent and go through both internal and public review as documented in the Division's current Land Management Plans.

For example, DWSP's solicitation of comments was timed to allow the public to provide input on specific projects before foresters develop a Forest Cutting Plan. Project proposals were made public at a conceptual stage so that public input can inform key aspects, such as project layout and timing, before final decisions, including individual tree selections, are made. DCR also provides more information than prior to Forests as Climate Solutions. Over the past several years, DWSP has lengthened the public comment period, enhanced proposals to include specific climate considerations, and regularly hosted staff led meetings, field tours, and interpretive programs to explain objectives and outcomes.

In conclusion, the public process it follows, the information it provides, where DWSP chooses to manage forest land, and the techniques it employs when it does so all reflect the influence of the Forests as Climate Solutions Initiative of the Healey-Driscoll Administration. DWSP undertakes mission-driven, science-based stewardship of public lands that belong to all Massachusetts residents. By integrating data, professional expertise, public input, and adaptive management, DWSP works to ensure that watershed forests continue to deliver exceptionally clean drinking water while also sustaining biodiversity, supporting wildlife habitat, moderating climate impacts, storing carbon, and providing enduring ecological, social, and economic benefits for generations to come.

DCR DWSP Summary of Comments and Responses about Specific Forest Management Proposals:

Two comments were received concerning the seven proposed projects listed below. Comments 6 and 7 were submitted by the same person and were identical in wording except for seven additional words in Comment 6; therefore, they are considered one comment. For purposes of DWSP's response, the reference to Comment 6 will serve as the response to both Comments 6 and 7. A summary of the comment/s is listed below for each of the referenced projects followed by DCR's response:

- PR-26-23
- PR-26-24
- PE-26-10
- PT-26-8
- PT-26-9
- WA-26-77
- WA-26-78

PR-26-23 (Comment 14):

Proposed heavy cuts (removing up to 70% of overstory) on Lot PR-26-23 are deemed "drastic." The commenter warns against the harvest because, without reductions in the moose population, regeneration of favored oaks will fail due to severe browse.

DWSP Response:

The site was selected because site conditions are well suited to restoring an oak-dominated woodland that is historically appropriate to the area and beneficial to wildlife. The proposed treatment reduces overstory density in a targeted portion of the stand to increase sunlight and, when paired with prescribed fire, reduce leaf litter and competing vegetation—conditions widely shown to improve oak regeneration. A senior restoration ecologist from the Division of Fisheries and Wildlife conducted field reviews and supported this approach.

The proposal does not call for removing all mature pines. The proposed forest management is a selective, variable reduction that retains trees for structure, soil stability, and water-quality protection while still creating the light conditions needed for oak recruitment.

High moose and deer browse is a known regional challenge. Because DWSP does not control wildlife populations, foresters use silvicultural tools—such as heavier but bounded overstory reduction, prescribed fire, and retained slash—to help seedlings establish and grow above browse height.

This is a focused, science-based treatment aligned with the approach outlined in DWSP's Land Management Plan, designed first to protect drinking water while also improving forest resilience, habitat diversity, and long-term carbon storage consistent with the Commonwealth's climate and biodiversity objectives.

PR-26-24 and PE-26-10 (Comment 14):

The use of large heavy equipment is deemed unsuitable for partial cut shelterwoods (PR-26-24) or thinning operations (Lot 26-10).

DWSP Response:

Modern cut-to-length harvesting equipment is widely used throughout the Northeast to implement the type of silviculture proposed. While today's machines can be larger than older equipment, advances such as wider tires and articulated frames significantly reduce ground pressure. DWSP projects follow all required and recommended BMPs. Equipment choice and operating methods are matched to site-specific soil, slope, and drainage conditions, and operations are scheduled for dry or frozen ground whenever feasible to minimize compaction and rutting.

The most important safeguards for soils, water, and residual trees are careful planning, clear communication of agency goals and expectations to contractors, and on-site oversight by agency foresters. DWSP foresters plan, supervise, and monitor harvests to ensure compliance and provide regular oversight to ensure contractors understand their obligations.

These forestry practices reflect decades of field experience, monitoring data, and current forestry science. By maintaining soil stability and hydrologic function during harvests, DWSP supports long-

term forest health, biodiversity, and carbon storage while advancing climate-informed stewardship goals consistent with DWSP's watershed protection mission.

PT-26-8 (Comment 14):

Specific stands (Lot PT-26-8) were identified in 1964 as 'exceptional', and these should be restored to "exceptional status" and not cut, as they now contain trees over 100 feet tall.

DWSP Response:

DWSP staff contacted the commenter to request documentation of the 1964 reference cited; however, no materials confirming the existence of such a report were provided. While DWSP cannot verify the specific source cited, language in earlier Quabbin Land Management Plans through the current DWSP Land Management Plan does make mention of outstanding trees and stands but never expressly implies complete avoidance of silviculture:

- **From 1972:** *"Outstanding individuals and stands will be retained for aesthetic, biological, or other reasons..."* Later in the report, *"Our tree marking guidelines are pretty much consistent for all the forest types but variations are permitted when the occasion warrants them. The major exceptions are for the uncommon forest. We have some extremely fertile sites with large volumes of timber which are very valuable. Since they represent only a small percentage of the entire forest, extreme care is taken in any silvicultural or harvest operation. **The most intensive silviculture is practiced in these stands using only light logging equipment, to permit frequent light cuttings.** In other words these stands are treated very gently, to maintain outstanding examples of nature's supreme effort."* [emphasis added]
- **From 1986:** There does not seem to be a reference to 'outstanding' or 'exceptional' trees, but in the description of White Pine types at Quabbin it does read, *"...Pine stands of good quality and greater than one hundred feet in height are rare and do not comprise more than ten percent of the pine forest. **These stands will receive special care to maintain their vigor.**"* [emphasis added]
- **From 1995:** "Table 9: Areas with Special Management Restrictions" does not specifically call out exceptional stands as off-limits to harvesting, but in 'disturbance-sheltered areas' does state ***"Not restricted in past, these areas will receive relatively low intensity management to begin establishment of regeneration."*** [emphasis added]
- **From 2007** (in section 5.5.4.2, in the discussion of Late Seral Forest Conditions): *"...these stands are often on productive soils and with species well-suited to the site...They are not of great age but are of large diameter, exceptionally tall, and of high quality. Their location varies from very accessible to remote...Their importance is derived from both their scattered presence on the land and their potential to provide old growth attributes at an early age...These exceptional conditions for tree and stand development may be impossible to duplicate in the future, but the Division will try to take advantage of the exceptionally good conditions afforded by these stands...**Management of these stands will promote regeneration of similar species, maintain vigor of the overstory and allow for structural conditions similar to old growth. The selection system would be used employing single tree and small group removals and conducted every 30-50 years...**"* [emphasis added]

- **From the 2017 DWSP LMP** (on page 135): “DWSP foresters have traditionally preserved unusual features within regular management areas, some of which include old growth characteristics. These features range in size and type from individual “legacy trees” discovered and retained within a managed stand to small stands or sections of the landscape that have developed exceptionally old or large specimens of common or uncommon species. **Where such areas can be efficiently and effectively treated to enhance old growth characteristics, this practice may be applied.**” [emphasis added]

The rationale for retaining large and exceptional trees has evolved over time alongside advances in forestry science. Earlier emphasis often focused on timber quality and visual prominence. Current practice recognizes these trees as important structural and biological features that contribute to habitat complexity, long-term carbon storage, and late-successional or pseudo-old-growth characteristics within a largely even-aged landscape. The consistent goal throughout, however, has been intentional stewardship — not avoidance of management — guided by professional judgement and the best available science. Where retention also supports the goals of a treatment, forestry staff will continue to favor keeping these large “exceptional” trees.

Trees exceeding 100 feet in height are increasingly common on DWSP lands as forests mature, and size alone does not guarantee long-term stability. The 2017–2019 spongy moth defoliation event demonstrated this vulnerability, resulting in widespread mortality of dominant overstory oaks in some stands, particularly where regeneration layers were limited by browsing and a lack of recent management. These outcomes underscore the importance of encouraging regeneration in appropriate areas while preserving legacy trees and mature structure.

This balanced approach — retaining exceptional trees while strategically promoting regeneration — supports stand resilience, biodiversity, and continued carbon storage, while advancing DWSP’s core mission to protect drinking water quality and sustain healthy, diverse forests capable of adapting to future disturbances.

PT-26-9: (Comment 14):

Comment says that openings in certain stands (PT-26-9) could destabilize them, suggesting light thinning or no action.

DWSP Response:

A range of management options was evaluated for this site. Where the canopy remains fully closed, there is currently little to no understory regeneration, which can delay stand recovery and natural soil stabilization following a major disturbance and may increase long-term risk to watershed function and stream water quality. Continuing to take no action would be unlikely to improve forest structure, diversity, or resilience. Observations of naturally occurring single-tree gaps show regeneration dominated primarily by black birch and hemlock, indicating that a light-touch thinning alone would likely produce similarly low-diversity outcomes. At the same time, uniformly heavy thinning across the entire stand could leave residual trees vulnerable to windthrow and reduce overall canopy stability.

The proposed treatment therefore applies multiple, science-based strategies. Patch regeneration cuts on approximately one-third of the area will introduce enough sunlight to establish a broader mix of native species while limiting the number of residual trees exposed to wind. Most of the remaining

area will be selectively thinned to remove less vigorous trees and improve growing conditions for those retained, while smaller sections will remain untreated to preserve existing structure and provide comparison areas for monitoring.

Follow-up regeneration monitoring will inform future decisions in similar stands. This diversified, adaptive approach supports watershed protection while promoting species and age-class diversity, strengthening resilience to pests, storms, and climate stressors, and maintaining the forest's ongoing ability to store carbon and provide habitat — consistent with DWSP's mission and the Commonwealth's broader climate-informed forestry direction.

WA-26-78 and WA-26-77 (Comment 6):

Specific logging proposals (WA 26-78 and WA 26-77) affect MA NHESP habitat areas, but project summaries contain only boilerplate language with no details on how protection will be achieved.

DWSP Response:

Some proposed forest management projects overlap with areas identified as habitat by the Massachusetts Natural Heritage and Endangered Species Program (NHESP). The project summaries use generalized language to acknowledge the occurrence of a listed species or rare habitat.

In accordance with NHESP guidance, detailed information on the presence, identity, and location of state-listed rare species cannot be disclosed in publicly available documents. This is a standard and necessary practice designed to prevent unintended disturbance, collection, or exploitation of sensitive species and their habitats. As a result, public-facing project summaries intentionally use generalized language to describe protections.

Importantly, this does not indicate a lack of specificity in how rare species are protected. DWSP foresters and biologists integrate a precautionary, science-based approach during internal planning. Proposed operations are shaped with an understanding of the types of constraints NHESP may require, ensuring that forest management in rare species habitat is considered from the outset. However, these projects are still in the internal planning stage and NHESP has not yet completed its formal regulatory review and recommendations at this stage of the process.

Then when a Forest Cutting Plan is submitted, DWSP works in close coordination with NHESP through a formal review process. This review results in site-specific recommendations and conditions that are incorporated directly into project design and implementation. These measures may include modified harvest boundaries, seasonal operating restrictions, equipment limitations, protective buffers, and on-site monitoring.

While detailed prescriptions are not included in these project summaries, rare species protection is guided by NHESP's expert review, regulatory oversight, and the proposal is evaluated in consultation with NHESP. The omission of the sensitive, management-specific details that may identify the location of a species reflects a deliberate attempt to ensure that vulnerable ecological resources are protected while still providing the public with a clear understanding of project intent and scope.